

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNIVERSAL ENTERTAINMENT  
CORPORATION, UE RESORTS  
INTERNATIONAL, INC. f/k/a OKADA MANILA  
INTERNATIONAL, INC. and TIGER RESORT,  
LEISURE AND ENTERTAINMENT, INC.

Plaintiffs,

v.

ALEXANDER EISEMAN, ZAMA CAPITAL  
ADVISORS LP, ZAMA CAPITAL STRATEGY  
ADVISORS LLC, JOHN DOE ENTITY 1, and  
CHRISTIAN LITTLEJOHN

Defendants.

No.: 23 Civ. 2250 (LGS)

**DECLARATION OF JED M. SCHWARTZ IN SUPPORT OF PLAINTIFFS'  
OPPOSITION TO DEFENDANTS' MOTION TO DISMISS**

I, Jed M. Schwartz, hereby declare as follows:

I am a member of the law firm Milbank LLP, counsel to Plaintiffs Universal Entertainment Corporation; UE Resorts International, Inc., formerly known as Okada Manila International, Inc.; and Tiger Resort, Leisure and Entertainment, Inc. (collectively, "Plaintiffs"). I am a member in good standing of the bar of the State of New York and of this Court.

1. I make this declaration in support of Plaintiffs' Opposition to Defendants' Motion to Dismiss based on my personal knowledge and review of documents, including the exhibits hereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Complaint filed on June 15, 2023 in the action *Rimu Capital Ltd. v. Ader, et al.*, Case No. 1:23-cv-05065 (S.D.N.Y.).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 21, 2023  
Scarsdale, New York



A handwritten signature in black ink, appearing to read "Jul 21", is written over a horizontal line.